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UNITED STATES DISTRICT COURT**DISTRICT OF NEVADA**

JOHN CARTER and CHRISTINE CARTER, Case No.: 2:16-cv-02967-RFB-VCF

Plaintiffs,

vs.

RICHLAND HOLDINGS, INC. d/b/a
ACCTCORP OF SOUTHERN NEVADA, a
Nevada Corporation; RC WILLEY aka RC
WILLEY FINANCIAL SERVICES, and
RANDALL CORPORATION d/b/a BOWEN
LAW OFFICES,

Defendants.

**STIPULATION AND ORDER TO
CONDUCT DEPOSITION BY REMOTE
MEANS**

Pursuant to Federal Rule of Civil Procedure ("FRCP") 30(b)(4), Plaintiffs John Carter and Christine Carter (together, "Plaintiffs"), by and through their attorney of record, Vernon Nelson, Esq. of The Law Office of Vernon Nelson, PLLC, and Defendant Richland Holdings, Inc. d/b/a AcctCorp of Southern Nevada ("AcctCorp"), by and through its attorneys of record, the law firm of Marquis Aurbach Coffing, hereby agree and stipulate as follows:

WHEREAS, AcctCorp served Notices of Intent to Issue Subpoenas and did cause to be served subpoenas for deposition testimony of the respective FRCP 30(b)(6) designees for several third-parties, including Experian Information Solutions, Inc.; Equifax; and TransUnion, for depositions to be conducted October 31, 2018; and upon Navy Federal Credit Union and Chase Bank, for depositions to be conducted November 1, 2018, at the offices of Marquis Aurbach

Coffing, located at 10001 Park Run Drive, Las Vegas, NV 89145;

WHEREAS, TransUnion contacted AcctCorp's counsel and requested that the deposition be conducted via remote means to allow TransUnion's FRCP 30(b)(6) designee(s) as well as the parties and their respective counsel to avoid having to travel to or from Illinois or Pennsylvania for the anticipated deposition;

WHEREAS, on October 22, 2018, the parties submitted a stipulation [ECF No. 74] for a remote deposition as to TransUnion, which is still pending, and AcctCorp's counsel continues to be informed by subpoenaed parties that their respective representatives are spread around the United States, thereby requiring either (1) the incurring of significant expense or (2) the various depositions be conducted by remote means to minimize costs for all involved; and

WHEREAS, Plaintiffs' counsel and AcctCorp's counsel agree that for purposes of time and cost efficiency, it is in the parties' and the various third-parties' best interest that the depositions be conducted by remote means should the subpoenaed party request, and they hereby ask the Court to enter an order on this stipulation, pursuant to FRCP 30(b)(4), to allow the remote deposition of the subpoenaed 30(b)(6) designee(s) requesting such accommodation.

Dated this 2nd day of November, 2018.

MARQUIS AURBACH COFFING

THE LAW OFFICE OF VERNON NELSON,
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By: /s/ Jared M. Moser
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By: /s/ Vernon Nelson
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ORDER

IT IS SO ORDERED this 2nd day of November, 2018.


UNITED STATES MAGISTRATE JUDGE